

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

ROBERT CYRUS,

Plaintiff,

VS.

Civil Action No.: 2:07-cv-144-ID

HYUNDAI MOTOR  
MANUFACTURING OF  
ALABAMA LLC,

Defendant.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Comes now the Plaintiff, Robert Cyrus, and moves the Court for an extension of time of two weeks to respond to Defendant's Motion for Summary Judgment. As grounds therefore Plaintiff says the following:

1. Plaintiff's counsel has a trial set for January 28, 2008, before the Honorable Myron Thompson, in the Middle District, in the case of Daniel Bryan Kelley v. Ricky Owens, et al., Civil Action Number 2:05-CV-1150-T. This case is scheduled to last for four days. Plaintiff's counsel will be occupied in preparing this case between now and the start of the trial on Monday and will be completely occupied in that case next week.

2. The Court has scheduled Plaintiff's reply to be due on February 5, 2008. As currently scheduled Plaintiff's counsel will not have sufficient time and so will not be able to adequately respond the Defendant's Motion for Summary Judgment.

3. Plaintiff's counsel has conferred with Defense counsel and explained his situation. Defense counsel has conferred with his client and stated that he has no objection to Plaintiff's

counsel obtaining a two week extension to be able to respond to Defendant's Motion for Summary Judgment.

WHEREFORE, premises considered, Plaintiff request a two week extension to respond to Defendant's Motion for Summary Judgment.

Respectfully submitted,

s/Richard J. Stockham III  
ASB-5599-k43r  
Attorney for the Plaintiff  
Stockham, Carroll & Smith, P.C.  
2204 Lakeshore Drive, Suite 114  
Birmingham, Alabama 35209  
Telephone (205) 879-9954  
Fax: (205) 879-9990  
E-Mail: [rjs@stockhampc.com](mailto:rjs@stockhampc.com)

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION

ROBERT CYRUS,

Plaintiff,

VS.

HYUNDAI MOTOR COMPANY,

et al.,

Defendants.

Civil Action No.: 2:07-cv-144-ID

## CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2008, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorneys of record:

Timothy A. Palmer

J. Trent Scofield

Brian R. Bostick

Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

## One Federal Place

1819 Fifth Avenue North, Suite 1000

Birmingham, AL 35209-2118

Email: [brian.bostick@odness.com](mailto:brian.bostick@odness.com)

Email: [trent.scofield@odness.com](mailto:trent.scofield@odness.com)

Email: [timothy.palmer@odness.com](mailto:timothy.palmer@odness.com)

s/Richard J. Stockham III

ASB-5599-k43r

Attorney for the Plaintiff

Stockham, Carroll & Smith, P.C.

2204 Lakeshore Drive, Suite 114

Birmingham, Alabama 35209

Telephone (205) 879-9954

Fax: (205) 879-9990

E-Mail: [rjs@stockhampc.com](mailto:rjs@stockhampc.com)

